

In re Patent Application of:
BRICHER ET AL.
Serial No. **10/806,667**
Filing Date: **March 23, 2004**

REMARKS

The Examiner is thanked for the thorough examination of the present application. Independent Claims 1, 13, 23, and 27, have been amended to further define over the prior art. Support for the amendments can be found in paragraphs 0034-0037 of the specification, for example. No new matter is being added. The patentability of the claims is discussed below.

I. The Claimed Invention

The present invention is directed to a cryptographic device. As recited in amended independent Claim 1, for example, the device includes a cryptographic module and a communications module removably coupled thereto. More particularly, the cryptographic module comprises a first housing, a user network interface carried by the first housing and comprising a plurality of different connectors for coupling the cryptographic module to different network devices, a cryptographic processor carried by the first housing and coupled to the user network interface, and a first connector carried by the first housing and coupled to the cryptographic processor. The communications module includes a second housing, a second connector carried by the second housing and removably mateable with the first connector of the cryptographic module, a network interface carried by the second housing and coupled to the second connector, and at least one logic device for cooperating with the cryptographic processor to determine a status of the communications module. Independent

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Claim 1 has been amended to recite the user network interface includes a plurality of different connectors for coupling the cryptographic module to different network devices. For example, and as described in the specification, the different connectors may be an RJ-45 connector, and a fiber optic connector.

Amended independent Claim 13 is directed to a related cryptographic device. Amended independent Claim 23 is directed to a related communications method, and amended independent Claim 27 is directed to a related communications system. Independent Claims 13, 23, and 27 have been amended similar to amended independent Claim 1.

II. The Claims Are Patentable

The Examiner rejected independent Claims 1, 13, 23, and 27 over Dhir et al. in view of Cheng. Dhir et al. is directed to a programmable integrated circuit, namely a field programmable gate array (FPGA), that can be used to handle different wireless local area network (WLAN) communication specifications. The integrated circuit includes a transceiver coupled to programmable gates, a memory coupled to the programmable gates for storing instructions for programming a first portion of the programmable gates with a selected one of a first type of a medium access layer and a second type of a medium access layer. The first type of the medium access layer is different from the second type of medium access layer, though both the first type of the medium access layer and the second type of the media access layer are

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compatible with the transceiver. The memory is configured for storing instructions for programming a second portion of the programmable gates as a baseband controller.

While the Examiner correctly acknowledges that Dhir et al. fails to teach a cryptographic module and a communications module that are removably coupled to one another, the Examiner contends that Chen provides these critical deficiencies. Chen is directed to an add-on card for a computer that is detachable from the computer and allows the computer to communicate with both wired and wireless networks. The add-on card includes an access control circuit, volatile and non-volatile memory, a wireless transmission module, and a network connection module. The network connection module has both an antenna for communicating with a wireless network, and a standard network cable port for connecting to a wired network.

Applicants submit that even a selective combination of the prior art references fails to disclose the claimed invention as recited in amended independent Claims 1, 13, 23, and 27. Amended independent Claims 1, 13, 23, and 27 recite the user network interface carried by the first housing and comprising a plurality of different connectors for connecting the cryptographic module to different network devices. In contrast, Cheng discloses a PCMCIA card including a single connection port to be connected inside a PCMCIA slot of a computer. In other words, Cheng can only connect to a network device via the PCMCIA connection, while, the claimed invention, as recited in amended

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independent Claims 1, 13, 23, and 27, for example, can connect using a plurality of different connectors. Using a plurality of different connectors advantageously allows quick configuration of the cryptographic module and reduced cost savings over having to purchase another cryptographic device with a different network interface for each desired application or network device. Accordingly, even a selective combination of the cited references fails to disclose the claimed invention, recited in amended independent Claims 1, 13, 23, and 27, for example.

Applicants further submit that the Examiner's combination of Dhir et al. and Cheng is improper, as a person having ordinary skill in the art would not turn to Cheng to combine with Dhir et al. to arrive at the claimed invention. More particularly, Dhir et al. is directed to a programmable integrated circuit for a WLAN. The communications module and the cryptographic module are purposely on a single FPGA (300) chip, as illustrated in Dhir et al. Combining Dhir et al. with Cheng so that the communications module and the cryptographic module would be removably coupled would require splitting the communications and cryptographic modules from the single FPGA.

Moreover, using Cheng as a motivation to modify Dhir et al. would result in breaking Dhir et al. between antenna 336 and WLAN transceiver 301, which is outside the FPGA chip and downstream from both the communications and cryptographic modules. This is because Cheng discloses removably coupling the communications modules to a connector portion, including a

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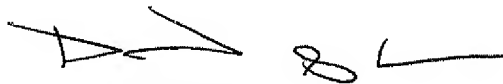
physical connector and antenna. Accordingly, even if there was some proper motivation to combine Dhir et al. and Cheng, the claimed invention is not produced because the removable coupling is not between the communications module and the cryptographic module.

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CONCLUSION

In view of the amendments to the claims and the arguments provided herein, it is submitted that all the claims are patentable. Accordingly, a Notice of Allowance is requested in due course. Should any minor informalities need to be addressed, the Examiner is encouraged to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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